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White Pine County  
Board of County Commissioners

010073

June 13, 2001

Dr. Jane Summerson  
EIS Document Manager  
M/S 010  
U.S. Department of Energy  
Office of Civilian Radioactive Waste Management  
Yucca Mountain Site Characterization Office  
P.O. Box 30307  
North Las Vegas, Nevada 89036-0307

**RE: Comments to Yucca Mountain Supplement to the Draft EIS for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada**


Dear Dr. Summerson:

As an "affected unit of local government" pursuant to the Nuclear Waste Policy Act, the Board of White Pine County Commissioners is submitting these comments on the Supplement to the Draft EIS for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada.

1 White Pine County is submitting these comments with the expectation that they will serve to enable the Department of Energy (DOE) to prepare a "legally sufficient" Final EIS which will satisfy the requirements of the National Environmental Policy Act and the Nuclear Waste Policy Act, as amended. The results will be a document which more fully considers the environmental consequences of constructing and operating the Yucca Mountain repository system. Failure by DOE to adequately address these comments may render the Final EIS legally insufficient.

I trust these comments to be of value and please feel free to contact me should you have any questions regarding these comments.

Sincerely,



Kevin Kirkeby  
Chairman

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Cc: Chairman, Nuclear Regulatory Commission  
Administrator, U.S. Environmental Protection Agency  
Members, Nevada Congressional Delegation  
Governor Kenny Guinn  
State of Nevada Agency for Nuclear Projects  
AULG's

## Comments of White Pine County, Nevada

Supplement to the Draft Environmental Impact Statement  
for a  
Geologic Repository for the Disposal of  
Spent Nuclear Fuel and High-Level Radioactive Waste at  
Yucca Mountain, Nye County, Nevada

- 2      **Page S-2** Will the flexible design allow for hotter fuel to be shipped to the repository? If so, what effect will this have on transportation risk? This issue is not addressed within the SDEIS. |
- 3      **Page S-2** Nuclear Regulatory Commission staff have indicated (at a March 29 workshop in Caliente) that utilities are looking into using multi-purpose dry-cask storage/transportation systems (and that NRC anticipates licensing same) that would require the spent fuel to be handled once prior to shipment to a repository. The SDEIS does not consider the possible use of such shipping/dry-cask storage systems, which could be placed above-ground at Yucca Mountain to achieve fuel aging/cooling objectives. The SDEIS should consider the transportation implications of such multi-purpose dry-cask storage/transportation systems. |
- 4      **Table S-2** Table S-2 is not consistent in providing a range of impacts for many parameters. |
- 5      **Table S-2** The SDEIS offers no explanation of the need for up to 4 times as much electrical energy and 5 times as much waste generation for the lower temperature alternative than the DEIS design. |
- 6      **Table S-2** Despite a small increase in total employment, the SDEIS projects a 42 percent increase in solid waste generated under the low temperature alternative. No explanation for this dramatic increase is afforded in the SDEIS. |
- 7      **Table S-2** The SDEIS predicts a 30 to 60 percent increase in material transport related traffic fatalities under the low temperature alternative, yet offers no suggestions for mitigating increased transportation risk or considers whether any mitigation measures proposed in the DEIS remain valid. |
- 8      **Table S-2** The SDEIS predicts up to a 50 percent increase in worker transport fatalities. This significant increase does not correlate with the estimated "small increase" in workers. |
- 9      **Page 1-2** The SDEIS does not consider the potential for Yucca Mountain to accommodate spent fuel in amounts beyond that considered within the DEIS due to the closer spacing to be achieved through the flexible design. The SDEIS should provide a new estimate of the total potential spent fuel and other high-level radioactive waste that could be emplaced in Yucca Mountain. |
- 10     **Page 2-3** The SDEIS should consider locating titanium drip shields, emplacement pallets and other required off-site manufactured goods in counties near to Yucca Mountain, in part, to mitigate otherwise unmitigable impacts. |

- 11 **Page 2-4** The SDEIS should consider the extent to which increased ventilation results in an enhanced exposure pathway.
- 12 **Page 2-6 and 2-7** The SDEIS should consider what, if any, effect closer spacing of waste package has upon the probability and consequence of a volcanic dike encountering one or more waste packages.
- 13 **Page 2-8** The socioeconomic impacts associated with an aging related extended emplacement period are not addressed.
- 14 **Page 2-9** The SDEIS indicates that DOE will continue performance confirmation activities following site approval and designation. DOE should propose to continue state and local government oversight functions to mitigate this longer site characterization-like process.
- 15 **Page 2-9** The SDEIS does not consider the potential for an extended fuel-aging process to also extend the transportation campaign.
- 16 **Page 2-11** The installation of drip shields at the time of repository closure may result in transportation of said shields to the site over a relatively short period of time (rather than over the period of emplacement). The SDEIS does not consider the transportation accident and fatality risk associated with a short-duration campaign to ship drip shields to the site. A mitigation measure might include installation of drip shields immediately following emplacement.
- 17 **Figure 2-4** Figure 2-4 of the SDEIS refers only to direct rail access and heavy-haul access to the site. The text on Page 2-12 refers to legal weight trucks. It is not clear if DOE anticipates legal weight trucks being used to transport waste directly to the Yucca Mountain site.
- 18 **Page 2-15** The use of dual-purpose dry cask storage/transportation systems for commercial spent nuclear fuel should be considered in the SDEIS.
- 11 cont. **Page 2-16** The SDEIS should include an assessment of the additional risk associated with creation of ventilation associated exposure pathways.
- 19 **Page 2-19** The SDEIS should be more specific on the authorization DOE will seek (state or federal?) for needed water supplies.
- 20 **Page 2-19** The SDEIS should consider use of Pinyon-Juniper biomass from White Pine and Lincoln County as an alternative to fuel oil for a central heating plant. Bureau of Land Management planned thinning of Pinyon-Juniper woodlands over the life of the repository will result in large quantities of biomass.
- 21 **Page 2-21** The SDEIS estimates that as much as 145 times as much air will be moved through the S&ER flexible design. Why is the risk associated with ventilation related exposure pathways not 145 times greater? There appears to be an inconsistency in the analyses.

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**Page 2-28** Given DOE's planned 30 year performance confirmation timeframe, the Department should recommend that local government oversight funding be continued through this same period as a mitigation measure.

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**Pages 3-4** These sections indicate that S&ER design fatalities from air quality, occupational health and safety, and accidents will increase from a low of 1.82 to 3.8 deaths. It is not clear if the long-term performance benefits from a latent cancer fatality standpoint are greater than the increase in short-term deaths. In fact, Table 3-14 does not even address latent cancer fatalities. As a consequence, it is not possible within the SDEIS to conclude whether the S&ER flexible design is better from a fatality perspective. This is a critical shortcoming of the SDEIS.